

February 9, 2009

To: All Penn Medicine Faculty

From: Arthur Rubenstein, MBBCh
Glen Gaulton, PhD
Peter Quinn, DMD, MD

Re: **Public Disclosure of Faculty Compensated Extramural Activities**

We are writing to bring you up to date on the creation of Penn Medicine's disclosure web site which will enable anyone to view all extramural activities engaged in by faculty for which compensation was provided by an outside entity. This web site is part of our commitment to transparency, not only to the public at large and our funding agencies but importantly, to the patients and research subjects who place their trust in us.

Extramural activities can often advance our scholarship and the state of medical practice, and accordingly, the University grants the faculty prescribed time to pursue these endeavors. Increasingly, however, some extramural activities by faculty at other institutions have led to serious conflicts of interest and those conflicts have been widely reported on. The consequence of these situations is that the management of extramural activities - once a matter internal to a University - has now become a national public policy issue. Penn is at the forefront of a group of academic medical centers who believe that by publicly disclosing extramural activities widely and encouraging dialogue, we will fulfill an important public obligation as well as decrease the potential for conflicts of interest.

The Penn disclosure web site information will be obtained from the annual extramural forms all faculty are already required to file so there will be no separate reporting for this web site. Further, the site will only report those extramural activities for which a faculty member received payments over and above their Penn compensation. In order to facilitate the provision of this information, going forward the annual disclosure report for extramural activities will be made on a calendar year basis thus enabling faculty to match activities to tax documents related to outside compensation. Importantly, while all compensated outside activities will continue to be disclosed in full detail on the internal form, on the web site personal compensation will be reported publicly

only in broad ranges such as “less than \$10,000 or \$10,000 to \$100,000” and so forth.

Faculty will receive the extramural activity disclosure form covering calendar year 2008 on or about March 1st and will be required to return the completed form by March 31st. Once the forms are reviewed and processed, a mock web site will be populated near the end of May using the submitted data so that faculty members can review and correct, if needed, their individual postings. The web site will be viewable to the public on July 1, 2009.

To further educate faculty on the importance of accurate and timely disclosure of extramural activities, we have prepared a presentation with background materials that can be accessed at <http://www.med.upenn.edu/fapd/ConflictofInterest.shtml>. In addition, questions can be directed to your Chair, Lee Dobkin in the Office of General Counsel or Victoria Mulhern in the Office of Faculty Affairs.

Finally, we want to remind you that as faculty members in the School of Medicine, you have an obligation to accurately disclose all extramural activities. An individual's failure to do so constitutes a serious violation of that obligation and compromises the integrity of our School.